

### **REMARKS**

Claims 14-41 are now pending in the application. Applicants cancel claims 1-13 without disclaimer or prejudice to the subject matter contained therein. Applicants add new claims 14-41. No new matter has been added.

Applicants would like to thank the Examiner for the courtesy extended during the personal interview conducted on April 19, 2006. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

### **REJECTION UNDER 35 U.S.C. § 101**

Claims 12 and 13 stand rejected under 35 U.S.C. § 101 for being directed to non-statutory subject matter. Applicants cancelled claims 12 and 13. This rejection is rendered moot.

### **REJECTION UNDER 35 U.S.C. § 102**

Claim 5 is rejected under 35 U.S.C. § 102(b) as being anticipated by Kim, U.S. Pub. No. 2002/0176301. Applicants cancelled claim 5. This rejection is rendered moot.

### **REJECTION UNDER 35 U.S.C. § 103**

Claims 1, 3, 4, 6-13 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kim in view of Brodeur, U.S. Pat. No. 2003/0120797. Claims 2 and 7 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kim in view of Brodeur, and in

further view of Davis, U.S. Pub No. 2004/0260866. Applicants cancelled claims 1, 3, 4, and 6-13. These rejections are rendered moot.

#### **NEW CLAIMS**

Applicants respectfully submit that Kim and Brodeur, either singly or in combination, fail to show, teach, or suggest a read assembly module that communicates with the first memory and the queue module, that receives a request to read the first and second data segments from a host, that reads the plurality of data blocks from the first memory based on the data lengths and data start addresses, that extracts the first and second data segments from the plurality of data blocks, and that transfers the first and second data segments contiguously to the host.

For anticipation to be present under 35 U.S.C §102(b), there must be no difference between the claimed invention and the reference disclosure as viewed by one skilled in the field of the invention. Scripps Clinic & Res. Found. V. Genentech, Inc., 18 USPQ.2d 1001 (Fed. Cir. 1991). All of the limitations of the claim must be inherent or expressly disclosed and must be arranged as in the claim. Constant v. Advanced Micro-Devices, Inc., 7 USPQ.2d 1057 (Fed. Cir. 1988). Here, Kim and Brodeur fail to disclose the limitation of a read assembly module that reads a plurality of data blocks, that extracts first and second noncontiguous data segments from the plurality of data blocks, and that transfers the first and second data segments contiguously to the host.

With respect to Kim, the Examiner alleges that FIG. 11 discloses a read assembly module, a read command queue 24, and a controller 30 that controls the read command queue. The description of FIG. 11 states:

FIG. 11 is a block diagram illustrating a virtual static random access memory device in accordance with a first embodiment of the present invention. The virtual static random access memory device includes: a memory cell array block 34 having a DRAM memory cell; a data I/O buffer 20 for inputting/outputting data through DQ pads DQ0 through DQi; an address buffer 22 for externally receiving address signals A0 through Ai; a command buffer 24 for externally receiving command signals /CS, /WE, /OE, /LB, /UB; a data register 26 for storing write data from the data I/O buffer 20, outputting the write data to the memory cell array block 34, storing read data from the memory cell array block 34, and outputting the read data to the data I/O buffer 20; an address register 28 for storing an address signal from the address buffer 22, and outputting the address signal to the memory cell array block 34; a refresh controller 32 for precharging and refreshing a memory cell of the memory cell array block 34; and a controller 30 for receiving the command signal from the command buffer 24, the address signal from the address buffer 22, the data signal from the data I/O buffer 20 and the data signal from the memory cell array block 34, and controlling the data I/O buffer 20, the data register 26, the address register 28, the refresh controller 32 and the memory cell array block 34. (Paragraph [0062]).

Applicants respectfully submit that FIG. 11 of Kim is absent of any teaching of a read assembly module that extracts first and second noncontiguous data segments from a plurality of data blocks and that transfers the first and second data segments contiguously to the host.

With respect to Brodeur, the Examiner alleges that FIG. 1 discloses a register R3 for concatenating data segments having different data segment size. Applicants note that Brodeur does not disclose a plurality of data blocks that include first and second noncontiguous data blocks and a read assembly module that transfers the first and second data blocks contiguously. In contrast, Brodeur states:

3) At step 602, the contents of registers R1 and R2 are combined in register R3; 4) Finally, at step 603, the contents of register R3 are written into the memory location 31 addressed by address L48" within the packet buffer. (Paragraph [0045]).

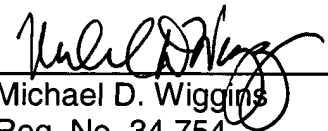
Brodeur fails to disclose that the data in registers R1 and R2 are noncontiguous data segments included in a plurality of data blocks. Brodeur further fails to disclose that the concatenated data (i.e. the contents of register R3) is transferred contiguously to a host. Applicants respectfully submit that claims 14-41 should be allowable over Kim and Brodeur for at least the above reasons.

### CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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